



AHMAD KESHAVARZ

Attorney at Law

MEMO ENDORSED

16 COURT ST., SUITE 2600
BROOKLYN, NY 11241-1026

WWW.NEWYORKCONSUMERATTORNEY.COM
E-mail: ahmad@NewYorkConsumerAttorney.com

PHONE: (718) 522-7900
FAX: (877) 496-7809

November 28, 2012

The Honorable J. Paul Oetken
United States District Judge
Southern District Of New York
500 Pearl Street
New York, NY 10007

*The Nov. 29 conference
is hereby adjourned
sine die.*

SO ORDERED:

Via fax to (212) 805-7991

Re: *Request to adjourn conference for November 29, 2012.*

J. Paul Oetken
J. PAUL OETKEN
U.S.D.J. 11-28-12

*Case No.: 1:12-cv-01559-JPO, Beriguet v. State Recovery, Inc. et al
LLP, Southern District of New York*

Dear Judge Oetken:

The undersigned represents Plaintiff in this suit for violations of the Fair Debt Collection Practices act and for violations of the Uniform Commercial Code, including for breach of the peace in an attempt to repossess a vehicle.

When Your Honor set the initial scheduling order on June 22, 2012, you set at status conference for November 29, 2012 at 11:15 AM. However, on October 12, 2012, you issued an order [DE 34] referring this case to the magistrate for pretrial matters and to set a new discovery schedule given the recent addition of additional Defendants.

On October 22, 2012, Magistrate Judge Sarah Netburn set an initial pretrial conference [DE 37] for December 4, 2012 at 10:00 AM to issue a new discovery order.

In light of the discovery conference with the magistrate next week, Plaintiff requests the adjournment of the November 29, 2012 conference with Your Honor. This is Plaintiff's first request for adjournment. Defendants Nissan Motors Acceptance and Asset Management Outsourcing Recoveries, Inc. d/b/a AMO Recoveries consent to this request. Counsel for the remaining Defendants have not responded to an email requesting consent, but the undersigned has no reason to believe they would not consent as a hearing has been set with the magistrate for next week.

Sincerely,

/s/

Ahmad Keshavarz

cc: opposing counsel (via email)